

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

TSAKOS INC. t/a HANOVER MANOR, on
behalf of itself and all others similarly situated,

Plaintiff,

v.

THE HANOVER INSURANCE GROUP,
INC. and CITIZENS INSURANCE
COMPANY OF AMERICA,

Defendants.

Civil Action No.: 2:20-cv-08889 (ES-CLW)

**DEFENDANT CITIZENS INSURANCE
COMPANY OF AMERICA'S NOTICE OF
MOTION FOR JUDGMENT ON THE
PLEADINGS**

Return Date: April 5, 2021

To: Lindsey H. Taylor, Esq.
**CARELLA, BYRNE, CECCHI
OLSTEIN, BRODY & ANGELO**
5 Becker Farm Road
Roseland, New Jersey 07068
Attorneys for Plaintiff

PLEASE TAKE NOTICE that on April 5, 2021, at 9:00 a.m., or on such date as may be directed by the Court, Defendant Citizens Insurance Company of America (“Citizens”)¹, by and through its attorneys, Finazzo Cossolini O’Leary Meola & Hager, LLC, shall move before the United States District Court for the District of New Jersey, Newark Vicinage, for an Order granting Citizens’ Motion for Judgment on the Pleadings pursuant to Rule 12(c) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that in support of said Motion, Citizens will rely upon the Memorandum of Law and Certification of Jeremiah L. O’Leary, Esq. (with exhibits) submitted herewith.

¹ By Stipulation entered by this Court on November 19, 2020, all claims against Defendant, The Hanover Insurance Group, Inc., have been dismissed without prejudice.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is respectfully requested.

Dated: March 12, 2021

**FINAZZO COSSOLINI O'LEARY
MEOLA & HAGER, LLC**

By: /s/ Jeremiah L. O'Leary
JEREMIAH L. O'LEARY, ESQ.
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Attorneys for Defendant
Citizens Insurance Company of America

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of March 2021, I caused a true and complete copy of Defendant Citizens Insurance Company of America's Motion for Judgment on the Pleadings to be served on all other counsel of record through the Court's electronic case filing system addressed as follows:

Lindsey H. Taylor, Esq.
**CARELLA, BYRNE, CECCHI
OLSTEIN, BRODY & ANGELO**
5 Becker Farm Road
Roseland, New Jersey 07068
Attorneys for Plaintiff

/s/ Jeremiah L. O'Leary
JEREMIAH L. O'LEARY, ESQ.